

Stage 2 – Draft Standards Submission

There are a number of draft standards that do not appear to have been thought through to a logical conclusion.

1. RP Stocking densities

The proposed requirement for sheep held in sheds in RPs to be afforded minimum 0.5 m² per head will reduce the holding capacity of sheds considerably forcing the operator to either:

- a. Build more sheds to accommodate a consignment. Not really a realistic option given the current uncertainty in the live sheep industry.
- b. Move some of the sheep into feedlot paddocks which can be counter-productive if inclement weather becomes a factor. Salmonella, for example can be better managed in sheds.

Is there an issue with RP's now? We are unaware of any and we are RP owners who are very concerned with how this will affect the viability of our business.

2. Incident reporting

Adding another level of complexity to the notifiable incident argument achieves nothing. The average daily mortality rate can be calculated by DAWR staff now, but what does it achieve? We fail to see how this will benefit anyone.

The DAWR already receives daily reports from the AAV and presumably from their own independent observer. What further level of comfort does this requirement achieve?

3. Stock handlers

The proposed requirement for one competent stock handler per 30,000 sheep (including the accredited stockperson) will inevitably cause shipboard accommodation problems unless the "competent stock handler" requirement can include ship's crew complement.

It is patronising and offensive to make the assumption that the "Australian" stock handlers know all and that the foreign crew are necessarily incompetent. Some of the seafarers have been looking after livestock all their lives and have good skills.

4. Sawdust (bedding)

The proposed requirement for long haul voyages to carry at least 4mt sawdust per 1000m² of cattle space as the minimum requirement for application after each washdown appears to be just an arbitrary amount. Surely this will vary with cargo and voyage conditions. Carrying hundreds of tons of bedding unnecessarily is a financial, logistical and labour intensive nightmare.